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# UNITED STATES DISTRICT COURT DISTRICT OF OREGON

**LORI WAKEFIELD**, individually and on behalf of a class of others similarly situated,

Plaintiff,

v.

**VISALUS, INC.**, a Nevada corporation,

Defendant.

No. 3:15-cv-01857-SI

Plaintiff's unopposed motion for an extension of time to file a declaration in support of Plaintiff's motion for attorney fees, costs, and an incentive award

## **EDELSON PC**

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Attorneys for Plaintiff Wakefield and the Certified Class

## **LR 7.1 CERTIFICATION**

Plaintiff's counsel conferred with counsel for ViSalus and ViSalus consents to the relief requested.

## **MOTION**

Plaintiff Lori Wakefield moves to extend the deadline to file Ms. Wakefield's declaration in support of Plaintiff's motion for attorney fees, costs, and an incentive award, to September 24, 2020. Plaintiff states:

<sup>\*</sup> admitted pro hac vice

- 1. Plaintiff's motion for attorney fees, costs and an incentive award is due today. *See* Dkt. 383. In support of this motion, Plaintiff intends to file a declaration from Ms. Wakefield, detailing her work as the class representative.
- 2. Plaintiff will file its motion today. Plaintiff requests, however, a two-week extension to file Ms. Wakefield's supporting declaration.
- 3. Good cause exists for the requested extension. Due to the Oregon wildfires, Ms. Wakefield was unexpectedly required to evacuate her house in Molalla, Oregon and could not finalize her declaration today.
- 4. Plaintiff respectfully requests that the Court enter an order allowing Ms. Wakefield to file her supporting declaration on or before September 24, 2020.

# Respectfully submitted,

Date: September 10, 2020

By: /s/ Simon Franzini
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